Exhibit "A"

From:

Patrick Healey

To:

GARY LIGHTMAN

Cc:

<u>Laver, Seth L.; Glenn Manochi; Kim DiTomaso; L&M Office</u> RE: AEE/Sternberg et als (Docket No. 22-0688)

Subject: Date:

Sunday, March 3, 2024 5:55:00 PM

Attachments:

image001.png ZEKARIA000001 - ZEKARIA000016.pdf

Counselors:

Attached please find documents bates stamped ZEKARIA000001 through ZEKARIA000016. I hope to produce more documents in the upcoming days.

Pat Healey



REBAR | KELLY

Patrick J. Healey Partner

424 Madison Avenue Suite 1001

New York, New York 10017 212.858.9970 | Fax 212.858.9971

C: 215.266.4879

E: phealey@rebarkelly.com
W: www.rebarkelly.com

NEW JERSEY 100 Overlook Center, 2nd Floor Princeton, NJ 08540 609.375.2070 | eFax 888.761.8299

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PENNSYLVANIA 470 Norristown Road, Suite 201 Blue Bell, Pennsylvania 19422 484.344.5340 | eFax 484.344.5341

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OHIO 4200 Regent Street, Suite 200 Columbus, OH 43219 614.245.2141 | eFax: 888.761.8299

From: GARY LIGHTMAN < ltag8r@me.com>
Sent: Saturday, March 2, 2024 4:49 PM
To: Patrick Healey < phealey@rebarkelly.com>

Cc: Laver, Seth L. <slaver@goldbergsegalla.com>; Glenn Manochi <gmanochi@lightmanlaw.com>; Kim DiTomaso

<kditomaso@lightmanlaw.com>; L&M Office <garylightman@lightmanlaw.com>

Subject: Re: AEE/Sternberg et als (Docket No. 22-0688)

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Patrick,

WHERE ARE THE ANSWERS OF THE ZEKARIA DEFENDANTS TO PLAINTIFF'S INTERROGATORIES AND DOCUMENT REQUESTS, AND ALL OF THE RESPONSIVE DOCUMENTS?

In your below email to us on December 24, you represented that you would send us the Zekaria

answers to plaintiff's discovery requests **by January 5, 2024**. However, over one month has passed since your 1/5 deadline, and WE STILL HAVE NOT RECEIVED the Zekaria discovery answers and documents.

Unless you email us the documents **by Monday**, it probably will be necessary to depose Zekaria a second time, after her 3/8/24 depo, once you do provide us with the Zekaria answers and documents to plaintiff's discovery requests.

Please confirm that the start time for Zekaria's 3/8 depo is 9:30 am. We can move that start time back to 10 am, if Zekaria needs it for driving purposes.

pls advise, asap

thx Gary Lightman cell 215-760-3000

On Dec 24, 2023, at 7:00 AM, Patrick Healey phealey@rebarkellv.com wrote:

Gary:

We will try to respond to your discovery requests by January 5, 2024.

Pat Healey

Patrick J. Healey Partner

<image001.png>

470 Norristown Road, Suite 201 Blue Bell, Pennsylvania 19422 P: 484.344.5336 | C: 215.266.4879

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OHIO 4200 Regent Street, Suite 200 Columbus, OH 43219 614.245.2141 | eFax: 888.761.8299 From: Gary Lightman < garvlightman@lightmanlaw.com>

Sent: Thursday, December 21, 2023 5:44 PM **To:** Patrick Healey < phealey@rebarkelly.com>

Cc: G. Manochi gmanochi@lightmanlaw.com; K. DiTomaso <kditomaso@lightmanlaw.com</pre>;;

GARY LIGHTMAN < ltag8r@me.com>

Subject: Re: AEE/Sternberg et als (Docket No. 22-0688)

Patrick,

When we spoke yesterday, you told me you would confirm in an email to me that the Zekaria Defendants will supply full and complete verified answers and all responsive documents to plaintiff's Interrogatories and Documents propounded on your clients on October 4, 2023, by no later than January 5, 2024.

Where is your confirming email?

pls advise, asap

thx Gary Lightman cell 215-760-3000

On Dec 21, 2023, at 12:04 PM, Patrick Healey ophealey@rebarkelly.com> wrote:

We have no opposition to this Motion.

Patrick J. Healey Partner

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<image001.png>

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OHIO 4200 Regent Street, Suite 200 Columbus, OH 43219 614.245.2141 | eFax: 888.761.8299 From: K. DiTomaso kditomaso@lightmanlaw.com

Sent: Thursday, December 21, 2023 11:57 AM

To: Seth Laver (slaver@goldbergsegalla.com)
slaver@goldbergsegalla.com; Samrosinc@icloud.com; publicdiamonds@gmail.com; Scg1212@gmail.com; Samrosinc@icloud.com; Gary Weiss (wgary4109@gmail.com)
wgary4109@gmail.com; monipair@aol.com; Patrick Healey
phealey@rebarkelly.com; Cathleen Kelly Rebar crebar@rebarkelly.com; Daphna

Zekaria (Sokolski.Zekaria@mindspring.com) < Sokolski.Zekaria@mindspring.com>
Cc: Gary Lightman < garylightman@lightmanlaw.com>; Gary Lightman (me)
(ltag8r@me.com) < ltag8r@me.com>; G. Manochi < gmanochi@lightmanlaw.com>

Subject: FW: AEE/Sternberg et als (Docket No. 22-0688)

Some people who received this message don't often get email from kditomaso@lightmanlaw.com. Learn why this is important

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Good morning:

Attached please find a time-stamped copy of Plaintiff's Motion for Entry of Default and Final Judgment against Defendants, ASOLARDIAMOND, LLC a/k/a ASOLAR, LLC and Gary Weiss. If you should have any questions, please do not hesitate to call. Thank you.

Sincerely,
Kim DiTomaso
Legal Assistant
Lightman & Manochi
Telephone: 215-545-3000 x 107
kditomaso@lightmanlaw.com

Gary Lightman Cell: 215-760-3000

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Gary Lightman, Esquire LIGHTMAN & MANOCHI cell: 215-760-3000

email: garylightman@lightmanlaw.com and Ltag8r@me.com

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